

DON GIBSON, LAUREN CRISS,
JOHN MEINERS, and DANIEL UMPA,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

THE NATIONAL ASSOCIATION OF
REALTORS, *et al.*,

Defendants.

Plaintiffs Don Gibson, Lauren Criss, John Meiners and Daniel Umpa (collectively, “Plaintiffs”) and defendants HomeServices of America, Inc., BHH Affiliates, LLC, HSF Affiliates, LLC, and The Long & Foster Companies, Inc. (collectively, “HomeServices”) hereby respectfully notify the Court that Plaintiffs have executed a binding term sheet with HomeServices to settle all claims asserted against HomeServices in this action as part of a proposed nationwide class settlement.¹ The settlement is subject to the Court’s approval under Federal Rule of Civil Procedure 23. Consistent with the Parties’ agreement, the Parties will cooperate to promptly execute a long form settlement agreement and then Plaintiffs will file a motion in this Court for preliminary approval of the proposed settlement.

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As provided by the settlement agreement, Plaintiffs and HomeServices hereby jointly request that the Court stay all deadlines and proceedings as to HomeServices to preserve the resources of Plaintiffs, HomeServices and the Court, and to seek preliminary and final approval of the settlement.

Dated: April 26, 2024

Respectfully submitted,

/s/ Robert D. MacGill

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CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2024, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Robert A. Braun
ROBERT A. BRAUN